

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

DAVID SIDOO et. al.

Criminal No.: 19-10080-NMG

Defendants.

PARTIALLY ASSENTED TO  
MOTION TO CONTINUE RESPONSE DATES FOR DISCOVERY MOTIONS

The United States of America, by Andrew E. Lelling, United States Attorney, and Eric S. Rosen, Assistant United States Attorney for the District of Massachusetts, respectfully files this (partially) assented to motion to continue the date responses are due for the discovery motions filed by the defense.

On December 9, 2019, Attorney Martin Weinberg, joined by other counsel, filed a motion for alleged exculpatory evidence contained in TIII Interceptions and Consensual Recordings. *See* Dkt. 681. The Government's response is due on December 23, 2019. The Government has conferred with Attorney Weinberg, who consents to extend the time for a response to January 14, 2019.

On December 13, 2019, Attorney Sean Berkowitz filed a motion to compel the production of material and exculpatory evidence as to defendants Mossimo Giannulli and Lori Loughlin. *See* Dkt. 693. The Government's response is due on December 27, 2019. The Government has conferred with Attorney Berkowitz, who consents to extend the time for a

response to January 17, 2020. The Government further consents to the defendants' filing of a response brief, with said brief to be filed, with the Court's consent, on January 31, 2020.

On December 18, 2019, Attorney Jack Pirozzolo filed a motion to compel the production of *Brady* and Rule 16 materials for Defendant William McGlashan, Jr. *See* Dkts. 696 and 697. The Government's response is due on January 2, 2020. The Government has conferred with Attorney Pirozzolo, who consents to extend the time for response to January 17, 2020.

On December 18, 2019, Attorney Michael Kendall, joined by other counsel, filed a motion to compel the production of exculpatory evidence as to John Wilson. *See* Dkt. 699. The Government's response is due on January 2, 2020. The Government has conferred with Attorney Kendall, who consents to extend the time for response to January 15, 2020. The Government respectfully requests until January 17, 2020 to file its response, as the issues raised in Wilson's brief are substantially similar to those of McGlashan, Loughlin and Giannulli, and filing briefs on the same day should reduce repetition amongst the billings.

As grounds for this motion, counsel for the Government states that due to the volume of motions filed, as well as the upcoming winter holidays, additional time is required to respond to the defendants' lengthy motions.

Accordingly, the Government respectfully moves to have its responses to Dkt. 681 be due on January 14, 2020, and its responses to Dkts. 693, 696, 697, and 699 be due on January 17, 2020. The Government respectfully reserves the right to seek further modifications if additional discovery motions are filed.

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

By: /s/ Eric S. Rosen  
Eric S. Rosen  
Assistant United States Attorney  
617/748-3412

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants .

\_\_\_\_s/Eric S. Rosen\_\_\_\_\_  
Eric S. Rosen  
Assistant United States Attorney

**Local Rule 7.1 Certification**

I hereby certify that the government has conferred with counsel for the defendants as set forth above, who, with the minor exception noted above, consent to this motion.

Date: December 19, 2019